

Environmental Protection Agency

117 W. Main Street Collinsville, IL. 62234

EPA Region 5 Records Ctr.



390935

CERTIFIED

P 731 932 901

618/345-4606

Refer to: LPC 1630450034 - St. Clair County - East St. Louis/Pfizer, Inc.
ILD006317119
Compliance Inquiry Letter

October 30, 1984

Pfizer, Inc.
Mineral, Pigments, and Metals Division
Mr. Jeffrey C. Carlton
2001 Lynch Avenue
East St. Louis, Illinois 62201

Dear Mr. Carlton:

Your facility was inspected on October 22, 1984 by H. D. Grant and P. W. McCarthy of this office. During this inspection, an apparent violation of the Illinois Environmental Protection Act and Rules and Regulations set forth by the Illinois Pollution Control Board was revealed. The purpose of this letter is to inquire as to your position with respect to the validity of the Agency's findings and also your plans to correct the apparent violation. Enclosed with this letter is a copy of the October 22, 1984 inspection report. The following apparent violation was observed:

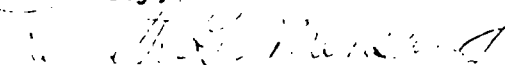
Section 725.152(c) - Failure to describe arrangements agreed to by local authorities. In the event the appropriate authorities decline to enter into such agreements, you must comply with Section 725.137(b).

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the apparent violation outlined above, as well as a description of the steps you have instituted to prevent any further recurrence of the above cited violation. The written response should be sent to the address of this office, given above.

Further, take notice that non-compliance with the Illinois Environmental Protection Act and the Rules and Regulations adopted thereunder may be the subject of an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111½, Ill. Rev. Stat., Sec. 1001 et seq.

If you have any questions regarding the above, please contact me at 618/345-4606.

Sincerely,


Kenneth G. Mensing, Southern Regional Manager
Field Operations Section
Division of Land Pollution Control

MDG:jlr

cc: Division File
Southern Region File ✓

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1630450034
STATE IDENTIFICATION NUMBER
(If Applicable)

TL0006317119
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: PFIZER INC. MPM DIVISION

(B) Street: 2001 LYNCH AVENUE

(C) City: EAST ST. LOUIS (D) State: ILLINOIS (E) Zip Code: 62201

(F) Phone: 618-271-4700 (G) County: ST. CLAIR

(H) Operator: PFIZER INC

(I) Street: 235 EAST 42ND STREET

(J) City: NEW YORK (K) State: NY (L) Zip Code: 10017

(M) Phone: 212-573-2323 (N) County: _____

(O) Owner: SAME AS OPERATOR

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Date of Inspection: 10/22/84 (W) Time of Inspection (From) 9:40 AM (To) 11:30 AM

(X) Weather Conditions: SUNNY, 55°

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Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed

Title

Telephone

JEFF CARLTON

SAFETY+ENV ENG.

618-271-470

(Z) Inspection Participants

Agency/Title

Telephone

JEFF CARLTON

SAFETY+ENV ENG

618-271-4700

PAT McCARTHY

IEPA/ENS

618-345-4606

Mike Grant

IEPA/LSCT

618-345-4606

(AA) Preparer Information

Name

Agency/Title

Telephone

Mike Grant

IEPA/LSCT

618-345-4606

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

☒ A. Storage and/or Treatment

1. Containers (I)

☒ 2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

☐ D. Incineration and/or Thermal Treatment
(O and P)

☐ E. Chemical, Physical, and Biological
Treatment (Q)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source? NA

2. Facility expansion? NA

(B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? ✓

2. Does the owner or operator have a detailed waste analysis plan on file at the facility? ✓

3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? ✓

Waste is K062, however each load received is analyzed to ensure it meets process specs.

(C) Security - Do security measures include: (if applicable):

1. 24-Hour surveillance? ✓

2. Artificial or natural barrier around facility? ✓

3. Controlled entry? ✓

4. Danger sign(s) at entrance? ✓

*Fenced
3 gates are guarded +
equipped with TV monitors*

D) Do Owner or Operator Inspections Include:

1. Records of malfunctions? ✓

2. Records of operator error? ✓

3. Records of discharges? ✓

111. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓	---	---	-----
5. Safety, emergency equipment?	✓	---	---	-----
6. Security devices?	✓	---	---	-----
7. Operating and structural devices?	✓	---	---	-----
8. Inspection log?	✓	---	---	-----
 (E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	-----
2. Job descriptions?	✓	---	---	-----
3. Description of training?	✓	---	---	-----
4. Records of training?	✓	---	---	-----
5. Have facility personnel received required training by 5-19-81?	✓	---	---	-----
6. Do new personnel receive required training within six months?	NA	---	---	"No new employees hire in about 3 years."
 (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	-----
2. No smoking signs?	✓	---	---	-----
3. Separation and protection from ignition sources?	NA	---	---	Spent Pickle liquor is not Ignitable.

*Not Inspected

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IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

____ ✓ ____

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

✓ ____

2. Telephone or 2-way radios at the scene of operations?

✓ ____

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ ____

Indicate the volume of water and/or foam available for fire control:

13 Fire Hydrants located throughout the facility

(C) ~~Testing and Maintenance of~~
Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ ____

*Emergency equipment
inspected monthly*

2. Is emergency equipment maintained in operable conditions?

✓ ____

(D) ~~Has owner or operator provided~~
~~immediate access to internal~~
alarms? (if needed)

✓ ____

*Not Inspected

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(E) Is there adequate aisle space
for unobstructed movement?

NA

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the
following information:

Yes No NI* Remarks

1. The actions facility personnel
must take to comply with
§265.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part (as
applicable.)

✓

2. Arrangements agreed by local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37?

✓

See Remarks

3. Names, addresses, and phone
numbers (office and home) of all
persons qualified to act as
emergency coordinators?

✓

4. A list of all emergency equipment
at the facility which includes the
location and physical description
of each item on the list and a
brief outline of its capabilities?

✓

5. An evacuation plan for facility
personnel where there is a possibility
that evacuation could be necessary?
(This plan must describe signal(s)
to be used to begin evacuation,
evacuation routes, and alternate
evacuation routes?)

NA

*Not Inspected

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6

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V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
			NA	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

Only one waste treated but each batch is trace on inspection logs.

c. The location and quantity of each hazardous waste within the facility?

✓

All waste K062.

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

NA

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

f. Reports detailing all incidents that required implementation of the Contingency Plan?

NA

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

Yes No NI* Remarks

(A) Closure and Post Closure

1. Is the facility closure plan available for inspection by May 19, 1981?

☒ Yes ☐ No ☐ NI*

2. Has this plan been submitted to the Regional Administrator

☐ Yes ☒ No ☐ NI*

3. Has closure begun?

☐ Yes ☒ No ☐ NI*

4. Is closure estimate available by May 19, 1981?

☒ Yes ☐ No ☐ NI*

(B) Post closure care and use of property

Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)

NA

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I

USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____

Date of Inspection: _____

Yes No NI* Remarks

NA

1. Are containers in good condition?

☐ Yes ☐ No ☒ NI*

2. Are containers compatible with waste in them?

☐ Yes ☐ No ☒ NI*

3. Are containers stored closed?

☐ Yes ☐ No ☒ NI*

4. Are containers managed to prevent leaks?

☐ Yes ☐ No ☒ NI*

5. Are containers inspected weekly for leaks and defects?

☐ Yes ☐ No ☒ NI*

6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)

☒ Yes ☐ No ☐ NI*

DEC 03 1984

Yes No NI* Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

NA

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

✓

J
TANKS

Facility Name: PFIZER INC

Date of Inspection: 10/22/84

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? ✓

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

✓

3. Do continuous feed systems have a waste-feed cutoff?

NA

Batch Feed

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

NA

All waste is K062

5. Are required daily and weekly inspections done?

✓

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

NA

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

NA

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Pfizer utilizes spent pickle liquor, K062 from three specific generators. Spent pickle liquor is received at Pfizer with a manifest. Pfizer treats spent pickle liquor in their process and renders it non-hazardous. Each load received by Pfizer is sampled and analyzed to ensure it meets the process specifications. The spent pickle liquor is stored in three tanks prior to being introduced into the six neutralization tanks. The treatment process consists of the six open top neutralization tanks containing the spent pickle liquor. Scrap iron is added to the steam heated pickle liquor. This reaction forms iron salts and takes from eighteen to twenty-four hours to be completed. After the reaction is complete the remaining liquid no longer exhibits hazardous waste characteristics. These iron salts are the primary ingredient in the production of pigments.

All nine tanks are inspected weekly to detect signs of leakage or corrosion. The freeboard level in the six open top tanks is inspected daily as a part of the operating log kept on the treatment process.

All personnel data and documentation of RCRA training is kept up to date. All manifests are kept in monthly order by generator. The contingency plan contained all the required content and has been sent to the local authorities. However, documentation did not exist which describes the arrangements agreed to by the local authorities. All other required documents were made available for our inspection.

Apparent Violations:

725.152(c)

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